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## REMARKS

This is intended as a full and complete response to the Final Office Action dated December 21, 2006, having a shortened statutory period for response set to expire on March 21, 2007.  Applicants submit this response to place the application in condition for allowance or in better form for appeal

Claims 1-4 and 6-20 are pending in the application.  Claims 1-4 and 6-20 remain pending following entry of this response.  Applicants respectfully request consideration of the pending claims for the reasons discussed below.

### Claim Rejections - 35 U.S.C. § 103

Claims 1-4 and 6-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Gupta et al.* (U.S. Pat. No. 6,956,593 81, hereinafter, *"Gupta"*).  Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness.  *See* MPEP § 2142.  To establish a *prima facie* case of obviousness three basic criteria must be met.  First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings.  Second, there must be a reasonable expectation of success.  Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations.  *See* MPEP § 2143.

The present rejection fails to establish at least the third criteria.  For example, the *Gupta* fails to teach retrieving, from a configuration file, information identifying at least one annotation structure associated with the at least one data object *based, at least in part, on the set of identifying parameters and a role of the user, the annotation structure defining one or more annotation fields into which annotation data will be entered*, as recited in independent claims 1, 7, 11, and 18.

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As described in section [0028] of the present application, when a user selects a set of one or more data objects for annotation, the configuration file may be accessed to determine a proper annotation structure for use in generating an annotation form, based, at least in part, on the selected data objects and a role of the user. In this manner, different annotation forms with different fields allow different types of annotation information to be captured *depending on the data object being annotated and the author creating the annotation.*

The Examiner cites *Gupta* Column 13, lines 25-67 as teaching retrieving from a configuration file information identifying an annotation structure associated with the data object based on identifying parameters. Applicants respectfully submit, however, that *Gupta* does not disclose associating an annotation structure with an identified data object *based, at least in part, on the identifying parameters of the identified data object.* In fact, *Gupta* does not disclose, and the Examiner has made no reference to, the existence of different annotation structures (i.e., annotations with different annotation fields) for different identified data object types.

Further, *Gupta* specifically teaches a system that leaves an annotation structure unchanged, even upon the selection of a different "targeted" data object. As recited in *Gupta* Column 13, lines 40-50:

> Interface 152 assumes that the current media stream being presented to the user is the media stream to which the new annotation will be associated. The media stream to which an annotation is associated is referred to as the "target" of the annotation. An identifier of this stream is displayed in a target specification area 300 of dialog box 280. Alternatively, a user could change the target of the annotation, such as by typing in a new identifier in target area 300, or by selection of a "browse" button (not shown) that allows the user to browse through different directories of media streams.

In other words, *Gupta* teaches to associate an annotation structure with an identified data object, *without regard to the identifying parameters of the identified data object.* In fact, from within the annotation interface, the annotated data object may be selected,

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with no teaching that any different types of fields will be presented for entering annotation information.

Therefore, Applicants submit claims 1, 7, 11, and 18, as well as those claims that depend therefrom, are allowable and respectfully request withdrawal of this rejection.

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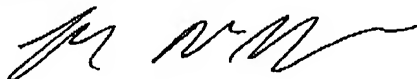
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## Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Randol W. Read, attorney, at (713) 623-4844, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted,

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